

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE:) Case No. 23-80623
)
DANNIE L. BENNETT, JR., AND) MOTION BY DEBTOR TO
MARIA J. BENNETT,) CONVERT TO CHAPTER 7
)
Debtors.)

The Motion of the above Debtors, respectfully represents:

1. Movants are the Debtors in the above-entitled case, having filed a Voluntary Petition for relief under Chapter 13 of Title 11, United States Code on August 11, 2023.
2. This case has not been converted under any chapter of Title 11, United States Code.
3. The Debtors are persons who may be Debtors under Chapter 7 of the Bankruptcy Code.
4. The Debtors hereby request conversion of this case to a case under Chapter 7 of the Bankruptcy Code.

WHEREFORE, Debtors pray this Court enter an Order for conversion of this case to a case under Chapter 7 of Title 11, United States Code, pursuant to 11 U.S.C. §1307.

Dated this 10th day of October, 2024.

DANNIE L. BENNETT, JR., AND MARIA J.
BENNETT, Debtors

By: MORROW, POPPE
WATERMEIER & LONOWSKI P.C.
A Limited Liability Organization
201 North 8th Street, Suite 300
P.O. Box 83439
Lincoln, Nebraska 68501-3439
(402) 474-1731

By: /s/Joel G. Lonowski 
Joel G. Lonowski #19078

NOTICE OF OBJECTION/RESISTANCE DEADLINE

To: Creditors and Interested Parties Described Below:

On October 10, 2024, the Debtors filed their Motion to Convert to Chapter 7, and resistance to the Debtors' Motion should be filed on or before October 31, 2024, with the Clerk of the United States Bankruptcy Court, 100 Centennial Mall North, Room 460, Lincoln, Nebraska 68508, and a copy served upon the undersigned.

In the event that no objections are filed, an Order on the Debtors' Motion shall be entered by the United States Bankruptcy Judge without further notice to any parties.

In the event any resistance to the Debtors' Motion is filed and a hearing is required, then the Clerk of the Court will set a date and time for hearing. Any resistance should comply with Neb.R.Bankr.P. 9013-1.

Dated this 10th day of October, 2024.

CERTIFICATE OF SERVICE

I hereby certify that on October 10, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which sent notification of such filing to the following:

United States Trustee
Chapter 13 Trustee

and I hereby certify that I have mailed by United States mail, postage prepaid, the foregoing document to the following non CM/ECF participants:

all Creditors on Debtors' Mailing Matrix attached hereto

/s/Joel G. Lonowski 
Joel G. Lonowski #19078

Label Matrix for local noticing

0867-8

Case 23-80623-BSK

District of Nebraska

Omaha Office

Wed Oct 9 16:03:12 CDT 2024

Ally Bank Lease Trust - Assignor to Vehicle
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

ACAR Leasing LTD d/b/a GM Financial Leasing

PO Box 183853

Arlington, TX 76096-3853

ACAR Leasing Ltd. Dba GM Financial Leasing

c/o Michael P Gaughan

10484 Marty St

Overland Park, KS 66212-2559

Ally Bank c/o AIS Portfolio Services, LLC
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901BMO Bank N.A., c/o AIS Portfolio Services, L
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901Nationstar Mortgage LLC
14841 Dallas Parkway, Suite 350
Dallas, TX 75254-7685(p)NATIONSTAR MORTGAGE LLC
PO BOX 619096
DALLAS TX 75261-9096Wells Fargo Bank, N. A.
6818 Grover St. #302
Omaha, NE 68106-3632Wells Fargo Bank, N.A.
P.O. Box 1629
Minneapolis, MN 55440-1629US Bankruptcy Court
111 South 18th Plaza
Suite 1125
Omaha, NE 68102-1321ACAR Leasing LTD d/b/a GM Financial Leasing
P.O. Box 183853
Arlington, TX 76096-3853BMO Bank, N.A.
1 Corporate Drive, Suite 360
Lake Zurich, IL 60047-8945Bank of America
PO Box 15284
Wilmington, DE 19850-5284Bank of the West
PO Box 4021
Alameda, CA 94501-0421Capital One
PO Box 60519
City of Industry, CA 91716-0519Capital One N.A.
by American InfoSource as agent
PO Box 71083
Charlotte, NC 28272-1083Capital One Spark
PO Box 60519
City of Industry, CA 91716-0519Citi
PO Box 790046
Saint Louis, MO 63179-0046Citibank, N.A.
5800 S Corporate Pl
Sioux Falls, SD 57108-5027Dan Bennett, Sr.
835 South 67th Avenue
Omaha, NE 68106-1115Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025Discover Card
PO Box 6103
Carol Stream, IL 60197-6103Douglas E. Quinn
1601 Dodge Street
Suite 3700
Omaha, NE 68102-1627HEA Corporation
816 South 180th Avenue
Elkhorn, NE 68022-6917HEA Corporation
c/o Erickson Sederstrom, PC, LLO
Registered Agent
10330 Regency Parkway Drive, Suite 100
Omaha, NE 68114-3736Internal Revenue Service
Centralized Insolvency Operation
PO Box 7346
Philadelphia, PA 19101-7346Jay D. Koehn
1601 Dodge Street, Suite 3700
Omaha, NE 68102-1627(p)JEFFERSON CAPITAL SYSTEMS LLC
PO BOX 7999
SAINT CLOUD MN 56302-7999Jordan Mellican
1601 Dodge Street, Suite 3700
Attn: Douglas E. Quinn
Omaha, NE 68102-1627

LVNV Funding, LLC
Resurgent Capital Services
PO Box 10587
Greenville, SC 29603-0587

(p)NEBRASKA DEPARTMENT OF REVENUE
ATTN ATTENTION BANKRUPTCY UNIT
PO BOX 94818
LINCOLN NE 68509-4818

Pay Pal
PO Box 71718
Philadelphia, PA 19176-1718

Renee Mellican
1601 Dodge Street, Suite 3700
Omaha, NE 68102-1627

Sarpy County Attorney
1210 Golden Gate Drive, Suite 6001
Papillion, NE 68046-2839

Sarpy County Treasurer
1102 Easte 1st Street, Suite 4
Papillion, NE 68046

Small Business Administration
14925 Kingsport Road
Fort Worth, TX 76155-2243

Small Business Administration
District Counsel
10675 Bedford Avenue, Suite 100
Omaha, NE 68134-3605

Synchrony Bank
by AIS InfoSource LP as agent
PO Box 4457
Houston, TX 77210-4457

Wells Fargo Bank
PO Box 10335
Des Moines, IA 50306-0335

Wells Fargo Bank, N.A.
Default Document Processing
MAC# N9286-01Y
P.O. Box 1629
Minneapolis, MN 55440-1629

Dannie L. Bennett Jr
13411 Lochmoor Circle
Bellevue, NE 68123-3772

Erin McCartney
Chapter 13 Trustee
13930 Gold Circle
Ste 201
Omaha, NE 68144-2304

Jerry L. Jensen
Acting United States Trustee
Roman L. Hruska U.S. Trustee
111 S. 18th Plaza, Suite 1148
Omaha, NE 68102-1321

Joel G. Lonowski
Morrow Poppe Law Offices
201 No. 8th Street, Suite 300
Lincoln, NE 68508-2257

Jordan Mellican

Maria J. Bennett
13411 Lochmoor Circle
Bellevue, NE 68123-3772

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Nationstar Mortgage LLC
Attn: Bankruptcy Department
PO Box 619096
DALLAS, TX 75261 United States

Jefferson Capital Systems LLC
Po Box 7999
Saint Cloud MN 56302-9617

(d)Nationstar Mortgage LLC
Attn: Bankruptcy Department
PO Box 619096
Dallas, Texas 75261-9741

(d)Nationstar Mortgage LLC
PO Box 619096
Dallas, TX 75261-9741

Nebraska Department of Revenue
Attn: Bankruptcy Unit
Nebraska State Office Building
PO Box 94818
Lincoln, NE 68509-4818

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Ally Bank, c/o AIS Portfolio Services, LLC
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(u)BMO Bank N.A.

(u)BMO Harris Bank, N.A.

(u)HEA Corporation

(u)Nationstar Mortgage LLC

(d)Wells Fargo Bank, N.A.
6818 Grover St. #302
Omaha, NE 68106-3632

(d)Wells Fargo Bank, N.A.
P.O. Box 1629
Minneapolis, MN 55440-1629

(d)Ally Bank c/o AIS Portfolio Services, LLC
4515 N. Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

(d)Bank of the West
PO Box 4021
Alameda, CA 94501-0421

(u)Renee Mellican

End of Label Matrix	
Mailable recipients	46
Bypassed recipients	10
Total	56